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**Cc:** [Crossland, Ronnie](#); [Smith, Monica](#)  
**Subject:** Draft ITC update info you requested -- 04/02/2019  
**Date:** Tuesday, April 02, 2019 6:12:00 AM

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- EPA continues to participate in Unified Command with TCEQ, Harris County Pollution Control Services, and ITC.
- The number and amount of benzene detections has decreased steadily throughout the day, due to the continue removal of product from tanks and the tank farm, as well as continued use of foam as needed.
- The Executive Director of the TCEQ (Toby Baker), as well as the Commander of the USCG 8<sup>th</sup> District (Paul Thomas), and acting EPA Regional Administrator David Gray visited the site on Monday, April 1 to discuss transitioning, end points, and resource needs.
- Flushing in ditches on the southside of Tidal Road near the coffer dam and the Clean Harbors facility, as well as upper Tucker Bayou was conducted on April 1 to help keep the benzene levels down in that area.
- The SCAT and endpoints plans were provided to Unified Command for comments.
- The Equipment decontamination plan has also been provided for comment.
- Pumping into 57,000 bbl barge docked at ITC from waste storage tanks began on April 1.
- On April 1, Harris County Pollution Control announced they will hire a contractor to conduct soil sampling along Independence Parkway, and Tidal Road to help facilitate the reopening of the roads to public traffic.
- Late on April 1, ITC requested to utilize outfall 005 to drain the noncontact stormwater from the base oil tank farm that lies right along Tucker Bayou. EPA and TCEQ discussed with TCEQ management, who agreed to plan, as long as ITC samples the water (using their normal noncontact protocol) and the discharge will not affect operations on Tucker Bayou (ITC will work with EPA and USCG early on April 2 on approval of this issue). TCEQ and EPA received the sampling results early on April 2; both COD and pH are within their permitted limits.
- ITC announced a frac tank manifold and vacuum truck unloading area is being constructed. 4-500-barrel frac tanks will be connected in series, which will allow for 4-70 barrel or 130-barrel vac trucks to unload at the same time to the frac tank system.
- Several entities including Texas Commission on Environmental Quality (TCEQ), EPA, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- ITC continued air monitoring on April 1 (midnight to midnight); there were 3,825 VOC readings (627 detections) with and 2,720 benzene readings (445 detections).
- EPA continued mobile air monitoring on April 1 (24 hour) at 61 locations. There were 11 detections, with 0 detection above the action level noted.
- The Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft found no exceedances of the Texas comparison values on March 31, 2019. ASPECT has conducted a screening level assessment to evaluate the unreported or undetected releases of hazardous materials or contaminants at the ITC in Deer Park, Texas. The screening level results from ASPECT were compared to the ASPECT list of TCEQ short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCVs. Infrared and photographic data collected over the confluence area at Tucker and Buffalo Bayous indicated that product continues to be present in the boom network with some leakage.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on April 1, 2019. TAGA analyzed air samples for benzene, toluene and xylene down wind of the site.
- EPA conducted surface water sampling on April 1, 2019, at ten sample locations. Samples were collected from upstream of the confluence of Buffalo Bayou and the San Jacinto River (in the Old River at River Terrace Park and at the shoreline of Juan Sequin Historic Park), in the main channel of the San Jacinto River (upstream of the confluence with Buffalo Bayou), and downstream in the San Jacinto River. The surface water samples will be analyzed for Per- and polyfluoroalkyl substances, Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), Chemical Oxygen Demand (COD), and Oil & Grease.
- TCEQ continued handheld air monitoring on April 1 from 12:00 am to 10:00; approximately 166 readings were taken. No readings above the Unified Command action level were detected.
- Vacuum truck operations at Tucker Bayou and the outfall ditch continue on 24 hour basis.
- As of 7:00 pm on Sunday, April 1:
  - 118,300 feet of boom deployed
  - 61,807 bbl of product/water recovered from water operations
  - 92,222 bbl of product/water recovered from tank farm

- Approximately 465,000 gallons of foam concentrate used for fire-fighting/suppression and emission suppression
- 969 people working on-scene (field, command post)

Tank Status as 3:00 am on April 1, 2019

Tank #		Original Volume	Updated Volume	Flow rate	Transfer Method	Status	Notes
80 - 1	Base Oil	48,713 bbls	4,522 bbls			Standby	
80 - 2	Gasoline Blendstock	38,451 bbls	0 bbls			Complete	
80 - 3	Gasoline Blendstock	33,200 bbls	0 bbls			Complete	
80 - 4	Base Oil	34,808 bbls	7,393 bbls			Standby	
80 - 5	Xylenes	35,502 bbls	6,529 bbls			Standby	
80 - 6	Gasoline Blendstock	48,147 bbls	n/a			Standby	
80 - 7	Py Gas	42,680 bbls	Empty			Complete	
80 - 8	Naptha	69,482 bbls	9,072 bbls			Standby	
80 - 9	EMPTY	Empty	Empty			Standby	
80 - 10	Py Gas	14,294 bbls	2,207 bbls			Complete	
80 - 11	Base Oil	51,741 bbls	21,313 bbls			Standby	
80 - 12	EMPTY	Empty	Empty			Complete	
80 - 13	Toluene	13,854 bbls	0 bbls			Complete	
80 - 14	Py Gas	13,837 bbls	0 bbls		Inline System	Complete	
80 - 15	Py Gas	9,354 bbls	0 bbls			Complete	

*With Regards, Steve*



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"Frequently, my thoughts get bored and walk down to my mouth. Often, this is a bad thing."